



March 28, 2017

*Via Electronic Court Filing*

Honorable Steven C. Mannion, U.S.M.J.  
United States District Court  
U.S. Post Office & Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

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Re: *Bang v. BMW of North America, LLC, et al.*  
Case No. 2:15-cv-06945-MCA-SCM

Dear Judge Mannion:

The Parties write jointly to provide the Court with proposed agenda items in anticipation of the upcoming telephonic status conference before Your Honor on March 31, 2017 at 11:30 A.M. The Parties respectfully submit the following:

Discovery: Plaintiffs served initial discovery demands on January 6, 2017. BMW NA is beginning a rolling document production, and is finalizing discovery responses to be served within the next week. Counsel is awaiting additional documents to be provided by BMW NA for production and will continue producing responsive documents as received. BMW NA also plans to serve Requests for Production and Demand for Interrogatories to Plaintiffs shortly. The Parties are in the process of looking at possible dates for the scheduling of depositions.

Settlement: No settlement negotiations have occurred, but the Parties have both expressed openness to discussing settlement in the near future after production of the information currently being sought in discovery, which will enable a further evaluation of the liability and damages issues.

Thank you for your consideration of this matter.



McCUNE • WRIGHT • AREVALO  
ATTORNEYS AT LAW

Respectfully submitted,  
MCCUNEWRIGHTAREVALO, LLP

/s/ Matthew D. Schelkopf  
Matthew D. Schelkopf  
Liaison Counsel for Plaintiffs

BUCHANAN INGERSOLL & ROONEY PC

/s/ Daniel Z. Rivlin  
Daniel Z. Rivlin  
Counsel for Defendant  
BMW of North America, LLC